

# **EXHIBIT 19**

8. Admit or Deny that when Plaintiff registered for the USMLE Step I exam on November 18<sup>th</sup>, 2011, March 26<sup>th</sup> 2012, and December 7<sup>th</sup> 2012 that he was not yet aware that he suffered from Bipolar Disorder.

**Answer:** After reasonable inquiry based on the information it has or can readily obtain, defendants are unable to either admit or deny Request for Admission 8 because it pertains to plaintiff's subjective knowledge. Defendants admit that from the limited medical records to which they have had access, it appears that plaintiff was

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first diagnosed with bi-polar disorder in March 2013. Plaintiff has, however, objected to defendants obtaining plaintiff's complete medical records by subpoena, and a discovery motion regarding plaintiff's objections is pending, so defendants reserve the right to modify this answer should medical records provide different information.